

Ex. A

EXHIBIT A

Excerpts of transcript of the December
7, 2018 deposition of Dean Meyer,
Rule 30(b)(6) witness for Federal
Home Loan Mortgage Corporation

Ex. A



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Transcript of Dean Meyer, Corporate Designee

Date: December 7, 2018

Case: SFR Investments Pool 1, LLC -v- Washington Mutual Bank

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Transcript of Dean Meyer, Corporate Designee
Conducted on December 7, 2018

1 (1 to 4)

1	3
1 DISTRICT COURT	1 A P P E A R A N C E S
2 CLARK COUNTY, NEVADA	2 ON BEHALF OF THE PLAINTIFF:
3 - - - - -x	3 JASON MARTINEZ, ESQUIRE
4 SFR INVESTMENTS POOL 1, LLC a :	4 KAREN HANKS, ESQUIRE
5 Nevada limited liability company, :Case No.:	5 Kim Gilbert Ebron
6 Plaintiff, :A-12-672769-C	6 7625 Dean Martin Drive
7 v. :	7 Suite 110
8 WASHINGTON MUTUAL BANK, a Federal :DEPT NO. 28	8 Las Vegas, Nevada 89139
9 Association, JP MORGAN CHASE BANK, NA, :	9 702.485.3300
10 MTC FINANCIAL, INC dba TRUSTEE CORPS, :	10 (Via videoconference.)
11 a California Corporation, and :	11
12 GREGORY COOPER, an individual; :	12 ON BEHALF OF FREDDIE MAC:
13 DOES I through X, ROE CORPORATIONS :	13 JOHN H. MADDOCK, III, ESQUIRE
14 I through X, inclusive, :	14 McGuireWoods LLP
15 Defendants. :	15 Gateway Plaza
16 - - - - -x	16 800 East Canal Street
17	17 Richmond, Virginia 23219
18 Videoconference Deposition of FREDDIE MAC,	18 804.775.1000
19 By and through its Designated Representative,	19
20 DEAN MEYER	20 TIFFANY JOSEPH GOODSON, ESQUIRE,
21 McLean, Virginia	21 Freddie Mac
22 Friday, December 7, 2018	22
23 Job No.: 219469 2:03 p.m.	23
24 Pages: 1 - 67	24
25 Reported by: Lisa Kirk	25
2	4
1 Deposition of DEAN MEYER, held at	1 C O N T E N T S
2 the offices of:	2 EXAMINATION OF DEAN MEYER
3 PLANET DEPOS - TYSONS CORNER	3 PAGE
4 8270 Greensboro Drive	4 By Mr. Martinez 5, 63
5 Suite 110	5 By Mr. Maddock 59
6 McLean, Virginia 22102	6
7 888.433.3767	7
8	8
9	9
10	10 E X H I B I T S
11 Pursuant to Notice, before Lisa Kirk,	11 (Attached to the transcript.)
12 Court Reporter and Notary Public in and for the	12 MEYER DEPOSITION EXHIBIT PAGE
13 Commonwealth of Virginia.	13 Exhibit 1 Chase_Cooper_FHLMC00001 - 65
14	14 Chase_Cooper_FHLMC00007,
15	15 Chase_Cooper_FHLMC00059,
16	16 Chase_Cooper_FHLMC00060,
17	17 Chase_Cooper_FHLMC00069,
18	18 Chase_Cooper_FHLMC00115,
19	19 Chase_Cooper_FHLMC00116
20	20
21	21
22	22
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25	25

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2 (5 to 8)

5	<p>1 PROCEEDINGS</p> <p>2 Whereupon,</p> <p>3 DEAN MEYER,</p> <p>4 being first duly sworn or affirmed to testify to the</p> <p>5 truth, the whole truth, and nothing but the truth,</p> <p>6 was examined and testified as follows:</p> <p>7 EXAMINATION BY COUNSEL FOR THE PLAINTIFF</p> <p>8 BY MR. MARTINEZ:</p> <p>9 Q (Inaudible.)</p> <p>10 (The court reporter requested that Counsel</p> <p>11 repeat the question.)</p> <p>12 Q Good morning. My name is Jason Martinez.</p> <p>13 I represent SFR Investments Pool 1, LLC. In the</p> <p>14 room with me is Karen Hanks. She also represents</p> <p>15 SFR. Could you please state and spell your name for</p> <p>16 the record?</p> <p>17 A So Dean Meyer; D-E-A-N, M-E-Y-E-R.</p> <p>18 Q And what is your current occupation?</p> <p>19 A I work for Freddie Mac.</p> <p>20 Q And what's your title with Freddie Mac?</p> <p>21 A Director of loss mitigation.</p> <p>22 Q And just as a preliminary matter, there</p> <p>23 were a number of documents that we had sent over. I</p> <p>24 just want to make sure you have all those documents</p> <p>25 in front of you. There should be six sets, I think.</p>	7	<p>1 but it says FHLMC1, and then that one runs through</p> <p>2 7. And I have --</p> <p>3 MR. MADDOCK: Let me stop you there. This</p> <p>4 is John Maddock. The copy -- we have a document that</p> <p>5 has Bates numbers 1 through 5. And then there are</p> <p>6 two pages -- the last two pages, it appears that the</p> <p>7 right-hand side is cut off, so it's impossible to</p> <p>8 tell if there are Bates numbers.</p> <p>9 MR. MARTINEZ: Does it -- the last two</p> <p>10 documents you're referring to with the Bates numbers,</p> <p>11 does it look like it's a spreadsheet of some sort?</p> <p>12 MR. MADDOCK: Yes.</p> <p>13 MR. MARTINEZ: Okay. And then just -- it</p> <p>14 looks like it has columns that run A through M on the</p> <p>15 one page and A through P on the second page? You</p> <p>16 might have some of that cut off, but at least we're</p> <p>17 on the same page.</p> <p>18 MR. MADDOCK: Yes, we have columns A through</p> <p>19 J on both pages.</p> <p>20 MR. MARTINEZ: Okay. And those documents,</p> <p>21 for purposes of the depo, so that we're clear -- the</p> <p>22 document that starts -- the first column, A, is --</p> <p>23 it's I-D, underscore, loan, underscore, S-Y, S-T,</p> <p>24 underscore, G-E-N-D. That one will be -- that one is</p> <p>25 Bates-stamped as FHLMC6. If you want to put that on</p>
6	<p>1 A So I have two copies of a set of documents.</p> <p>2 Q Perfect. And just so I make sure that I</p> <p>3 have the same thing in front of me with you,</p> <p>4 (inaudible). Documents printed. There will be</p> <p>5 something called a Bates stamp and in this</p> <p>6 circumstance it starts with Chase, underscore,</p> <p>7 Cooper, underscore, FHLMC, and it has a series of</p> <p>8 numbers after that. Do you have that in front of</p> <p>9 you?</p> <p>10 A So none of the documents I have have a</p> <p>11 Bates stamp on them. Or some of the documents,</p> <p>12 okay.</p> <p>13 MR. MADDOCK: This is John Maddock on behalf</p> <p>14 of Freddie Mac. The deed of trust and corporate</p> <p>15 assignment of deed of trust are not</p> <p>16 Bates-numbered.</p> <p>17 Q Okay, but the other four, I guess, sets of</p> <p>18 documents are Bates-stamped, correct?</p> <p>19 A That's correct.</p> <p>20 Q And can you tell me the Bates stamps, just</p> <p>21 so we're on the same page? It looks like to me</p> <p>22 there's a grouping that starts at that Bates stamp I</p> <p>23 just relayed (phonetic) to you, but I'm going to</p> <p>24 refer to that by the numbers themselves. I'm not</p> <p>25 going to repeat that whole Bates stamp every time,</p>	8	<p>1 a document (inaudible) --</p> <p>2 (The court reporter requested clarification</p> <p>3 regarding the question.)</p> <p>4 Q If you want to make a note on the actual</p> <p>5 document, that's fine. I just need to make sure you</p> <p>6 see that, so that what we're referring to in the</p> <p>7 deposition is clear on the transcript.</p> <p>8 Then the second spreadsheet, the column</p> <p>9 heading is a heading of NBR_LOAN_MIDAS; is that</p> <p>10 correct?</p> <p>11 A Yes.</p> <p>12 Q Okay. It's got four rows. That one is</p> <p>13 Bates-stamped as 7. And then I have, essentially,</p> <p>14 three other groupings of documents I want to make</p> <p>15 sure you guys have. The next set in sequential</p> <p>16 order, it starts with Bates stamps 59 and 60.</p> <p>17 A Yes, I have that.</p> <p>18 Q Okay. And the one after that is a single</p> <p>19 page that's Bates-stamped 69?</p> <p>20 A Yes.</p> <p>21 Q And then the final remaining two pages,</p> <p>22 Bates-stamped 115 and 116?</p> <p>23 A Yes.</p> <p>24 Q Perfect. All right. So let's start</p> <p>25 with -- first I actually want to look at the one</p>

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3 (9 to 12)

9	<p>1 that's Bates-stamped 59 and 60. There's a large</p> <p>2 redaction on the page that's mostly blacked out.</p> <p>3 (Inaudible.)</p> <p>4 (The court reporter requested clarification</p> <p>5 regarding the question.)</p> <p>6 Q Just look at that one for me.</p> <p>7 A I have it.</p> <p>8 Q Okay. And then up at the top it says,</p> <p>9 Freddie Mac Funding Details Report, and it indicates</p> <p>10 that there's a seller name there and refers to</p> <p>11 Washington Mutual Bank, correct?</p> <p>12 A Yes.</p> <p>13 Q And that -- the next line down says seller</p> <p>14 identifier. Can you tell me what that six digit</p> <p>15 code means?</p> <p>16 A It's just a code that identifies who the</p> <p>17 seller was. It's a code that we assign to an</p> <p>18 individual seller. So in this case, seller -- that</p> <p>19 ID is associated with Washington Mutual Bank.</p> <p>20 Q Okay. And that seller identification</p> <p>21 number is unique to Washington Mutual, correct?</p> <p>22 A Yes.</p> <p>23 Q So what I mean by that, just to clarify, is</p> <p>24 that no other entity can carry the same seller</p> <p>25 identification number in Freddie Mac's system,</p>	11
10	<p>1 correct?</p> <p>2 A No, that's not correct.</p> <p>3 Q Can you clarify, because maybe the question</p> <p>4 was confusing.</p> <p>5 A So --</p> <p>6 Q Washington carries the seller</p> <p>7 identification number 145046, correct?</p> <p>8 A They did at the time this loan was sold to</p> <p>9 Freddie Mac.</p> <p>10 Q Okay. Does somebody else maintain that</p> <p>11 seller identification number now?</p> <p>12 A So in the case of Washington Mutual, when</p> <p>13 Chase purchased the assets from the FDIC of WAMU,</p> <p>14 Chase took over that identification number.</p> <p>15 Q Okay. So do you know what date that</p> <p>16 transfer occurred where the identification number</p> <p>17 listed on this document, which refers to</p> <p>18 Washington Mutual, was then transferred to</p> <p>19 JPMorgan Chase?</p> <p>20 A So I believe it was in 2008, when the FDIC</p> <p>21 transferred the assets of Washington Mutual to</p> <p>22 Chase.</p> <p>23 Q Do you remember the specific date for that?</p> <p>24 A I do not recall, but I know it's published</p> <p>25 on FDIC's website.</p>	12

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4 (13 to 16)

<p style="text-align: right;">13</p> <p>1 A So we --</p> <p>2 MR. MADDOCK: Objection, form.</p> <p>3 A So we would have records that would be able</p> <p>4 to reflect the change and the name from</p> <p>5 Washington Mutual to Chase.</p> <p>6 Q Okay. And that's a system you're referring</p> <p>7 to that you don't have a name for?</p> <p>8 A I believe it's -- it -- one of the places</p> <p>9 it's referenced is MIDAS, but I would have to check.</p> <p>10 But I believe that's one of the places that would</p> <p>11 reflect that change.</p> <p>12 Q Okay. And then, now, around the scope of</p> <p>13 that, that system that you're talking about that</p> <p>14 reflects changes in the MIDAS system, does that</p> <p>15 system reflect changes in other areas other than the</p> <p>16 seller identification number?</p> <p>17 A No. Again, it's not reflecting change.</p> <p>18 It's just populated with data from our corporate</p> <p>19 data warehouse that would identify the change in</p> <p>20 that ID. So if there were changes in other areas of</p> <p>21 MIDAS, that would be reflected in other screens</p> <p>22 within MIDAS.</p> <p>23 Q So when you're referring to that, are you</p> <p>24 saying that if they make a change in corporate data</p> <p>25 warehouse, as you put it, that will now reflect on</p>	<p style="text-align: right;">15</p> <p>1 for that particular ID, but we would have records</p> <p>2 that would reflect the timing of the change in the</p> <p>3 name for that specific seller ID.</p> <p>4 Q Okay. And what types of records would</p> <p>5 those be?</p> <p>6 A I would not be able to speak to exactly</p> <p>7 whether they would be in a report, whether they</p> <p>8 would be in a log, or whether they would be in</p> <p>9 another system that would house that -- reflect that</p> <p>10 change, but we would have that.</p> <p>11 Q Would you review that type -- those types</p> <p>12 of documents or anything like that before today's</p> <p>13 deposition in order to testify as to how those</p> <p>14 changes were made?</p> <p>15 A If I was -- felt that that was something</p> <p>16 that was material, then I would review those</p> <p>17 documents, yes.</p> <p>18 Q Well, I mean, you already testified that</p> <p>19 the seller identification number changed from WAMU</p> <p>20 to JPMorgan Chase, so did you review something in</p> <p>21 preparation for your deposition today that led you</p> <p>22 to that conclusion?</p> <p>23 MR. MADDOCK: Object, asked and answered.</p> <p>24 A So yes. So the Funding Details Report</p> <p>25 identifies Washington Mutual Bank as the --</p>
<p style="text-align: right;">14</p> <p>1 the MIDAS system, correct?</p> <p>2 A So, again, MIDAS would reflect what</p> <p>3 information is related to that -- in this case, the</p> <p>4 identification number for that ID. That data that</p> <p>5 hosts that information is our corporate data</p> <p>6 warehouse. So from the corporate data warehouse it</p> <p>7 would just automatically populate that change within</p> <p>8 MIDAS.</p> <p>9 Q Okay. That, I understand. I get that. So</p> <p>10 then, essentially, what happens is that after that</p> <p>11 identification number is reassigned to</p> <p>12 JPMorgan Chase, all of the places in MIDAS where</p> <p>13 that identification number comes up are going to</p> <p>14 represent JPMorgan Chase, correct?</p> <p>15 A That's correct.</p> <p>16 Q Okay. Now, what I'm getting at is, is</p> <p>17 there an independent way for me to tell exactly on</p> <p>18 what date that change occurred, meaning that it</p> <p>19 shows Washington Mutual on, you know, prior to X</p> <p>20 date and then post that date, it shows that it's</p> <p>21 been changed to JPMorgan Chase? Is there a way for</p> <p>22 me to tell?</p> <p>23 A So I'm not 100 percent sure if that would</p> <p>24 be reflected in MIDAS because MIDAS would reflect</p> <p>25 what is currently in the corporate data warehouse</p>	<p style="text-align: right;">16</p> <p>1 references that ID. The MIDAS screens, which would</p> <p>2 show that same ID as a seller, now reflects Chase as</p> <p>3 the entity associated with that ID. So I know that</p> <p>4 there was a change. And I know from my knowledge</p> <p>5 that at the time of when the servicing transferred</p> <p>6 from Washington Mutual to Chase through the sale of</p> <p>7 WAMU's assets from the FDIC to Freddie Mac, that's</p> <p>8 when that change would have occurred, but I did not</p> <p>9 look at any records within Freddie Mac to verify the</p> <p>10 exact date.</p> <p>11 Q I want you to take a second to look at the</p> <p>12 second page of the document we just referred to as</p> <p>13 Bates-stamped 60.</p> <p>14 MR. MARTINEZ: For the record, for the most</p> <p>15 part this document is almost entirely redacted except</p> <p>16 for what appears to be one line on Bates stamp 60.</p> <p>17 Q Now, we just talked about the seller</p> <p>18 identifier we were referring to on the previous</p> <p>19 page. Is that different than what is in that first</p> <p>20 column, which is identified as a seller loan</p> <p>21 identifier?</p> <p>22 A Yes.</p> <p>23 Q Okay. What is a seller loan identifier?</p> <p>24 A So each seller would have a unique loan</p> <p>25 number assigned to the loan when they sell it to us.</p>

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5 (17 to 20)

<p style="text-align: right;">17</p> <p>1 So that is the seller's identification for this 2 individual loan when it was sold to Freddie Mac. 3 Q Okay. And does that number ever translate 4 to anywhere else in the MIDAS system that I would be 5 able to track it that way? 6 A Yeah. So whenever there is a servicing 7 transfer and the new servicer assigns it its own 8 unique identifier loan number for that loan, then 9 MIDAS or our corporate data warehouse would update 10 what that identification number is, and that would 11 feed into MIDAS. 12 Q Okay. And I have a question. I want you 13 to put another document next to this one so we can 14 compare the two. It's the one that is Bates-stamped 15 115 and 116. First off (inaudible). 16 (The court reporter requested clarification 17 regarding the question.) 18 Q Do you have 115 and 116 in front of you? 19 A Yes, I do. 20 Q Okay. Can you tell me what 115 represents? 21 Well, there's two screenshots on this page, so can 22 you tell me what this screenshot is? 23 A So these are screenshots of our business 24 records from our MIDAS mainframe system. 25 Q Okay. Are they from a particular part of</p>	<p style="text-align: right;">19</p> <p>1 A Yes. 2 Q Okay. Now, this seller loan identifier, 3 which is in the first column on page 60, is that 4 number anywhere on Bates stamp 115? 5 A So yes. 6 Q Can you tell me where it is on that 7 document? 8 A So on the right-hand side, where it says 9 SSR loan number, that would be the seller/servicer 10 loan number, and that would be the loan number that 11 the current servicer is using, identifying this loan 12 in their system. 13 Q Okay. And that -- the last four of that is 14 9547, and that matches up with the first column on 15 Bates stamp 60? 16 A Correct. 17 Q Okay. So, now, let's go back. I was just 18 trying to match the numbers up. Can we go back to 19 Bates stamps 59 and 60; just because I didn't ask 20 this question broadly in the first instance. What 21 does the Freddie Mac Funding Details Report 22 generally show? 23 A So the funding detail report is created 24 when a seller, in this case Washington Mutual Bank, 25 sells, in this case, a pool of loans to Freddie Mac</p>
<p style="text-align: right;">18</p> <p>1 the MIDAS system? 2 A No. It's the -- the header on here is 3 called -- it's the loan basic inquiry, so that is 4 a -- a screen that has loan-basic information on an 5 individual loan. 6 Q Okay. So this -- and it looks like -- and 7 I'm just looking at the screenshot at the top 8 left-hand corner. It says page 1 of 2? 9 A That's correct. So the top screen is 10 page 1; the bottom screen is page 2. 11 Q Okay. And then, now, that seller loan 12 identifier that we were talking about that's on 13 Bates stamp 60, is that located anywhere on 14 Bates stamp 115? 15 A Yes. If you look in the left-hand column 16 by, like, the third row down, it says seller number. 17 That would house the seller number for who sold us 18 that particular loan. 19 Q And in this circumstance it looks like that 20 number is 145046. 21 (The court reporter requested clarification 22 regarding the question.) 23 A So I believe that's correct. 24 Q Okay. And that matches the seller 25 identifier number on Bates stamps 59, correct?</p>	<p style="text-align: right;">20</p> <p>1 at any particular day. It identifies who the seller 2 was. And then the parts that are redacted on the 3 two pages, every single row is another unique loan 4 that we purchased at the same time from 5 Washington Mutual. 6 Q Okay. And is there any way to tell by 7 looking at Bates stamps 59 and 60 the exact date 8 that Freddie Mac allegedly acquired this loan from 9 WAMU or Washington Mutual? 10 A So the Funding Details Report is not 11 time-stamped. 12 Q Okay. Do you know when this 13 Funding Details Report was generated from the MIDAS 14 system in order to be produced in this litigation? 15 A So the Funding Details Report is not 16 generated from MIDAS. It is a report that is 17 generated when the loan is sold to us from the -- 18 our selling system. So when the servicer transmits 19 the data for all the loans they are selling to us, 20 this report memorializes who the seller was, and a 21 list of loans, and under what product they sold it 22 to at that time. So it's created at the time we buy 23 it. 24 Q So this -- I know you said this report is 25 not created or pulled from MIDAS, correct?</p>

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6 (21 to 24)

<p>21</p> <p>1 A Correct.</p> <p>2 Q And you said it was pulled from the</p> <p>3 seller's systems that you use; is that correct?</p> <p>4 A So when the seller transmits data for the</p> <p>5 loans they're going to purchase or sell to</p> <p>6 Freddie Mac, it goes from their system to our</p> <p>7 system. It's called The Selling System. And that</p> <p>8 data is housed in -- again, all the loan-level data</p> <p>9 is housed in our corporate data warehouse. This</p> <p>10 Funding Details Report is generated from that</p> <p>11 information.</p> <p>12 Q Okay. And The Selling System you're</p> <p>13 referring to, does that have a name other than</p> <p>14 calling it The Selling System?</p> <p>15 A It's called The Selling System.</p> <p>16 Q Okay. Is there any way to tell when</p> <p>17 documents are generated from The Selling System and</p> <p>18 not from MIDAS?</p> <p>19 A So as I stated, this is not generated from</p> <p>20 The Selling System. So when the seller transmits</p> <p>21 data on loans that they're selling to Freddie Mac,</p> <p>22 that data is housed in our corporate data warehouse.</p> <p>23 That corporate data warehouse is where the data</p> <p>24 and -- that generates this Funding Details Report</p> <p>25 comes from.</p>	<p>23</p> <p>1 note is delivered to a third party. It's called our</p> <p>2 document custodian. That custodian reviews the</p> <p>3 information on the original note, compares that to</p> <p>4 the data that the seller is transmitting to</p> <p>5 Freddie Mac to state I'm selling you this loan with</p> <p>6 these particular details. They compare that to the</p> <p>7 information in the original note, and if the</p> <p>8 information is consistent, they certify that that</p> <p>9 note is consistent with the data, and that triggers</p> <p>10 us to purchase the loan.</p> <p>11 Q And in this circumstance, who was your</p> <p>12 document custodian?</p> <p>13 A At the time the loan was originated,</p> <p>14 Washington Mutual was the document custodian.</p> <p>15 Q So then if I understand that correctly,</p> <p>16 Washington Mutual was not only the seller, but the</p> <p>17 one that also -- the document custodian hired by</p> <p>18 Freddie Mac to verify the information they provided</p> <p>19 to Freddie Mac to certify that it was a true and</p> <p>20 correct copy and compare it with the note?</p> <p>21 MR. MADDOCK: Objection, form.</p> <p>22 A Yes.</p> <p>23 Q So WAMU certifies its own statements, and</p> <p>24 Freddie Mac acted upon that certification to</p> <p>25 purchase this loan?</p>
<p>22</p> <p>1 Q Okay. I'm just trying to get an idea. So</p> <p>2 is this Funding Details Report manually created,</p> <p>3 like, by human entry, or is it just, you know --</p> <p>4 it's not drawn from a system and just printed,</p> <p>5 correct?</p> <p>6 A It's automatically created at the time we</p> <p>7 purchase the loans from the data that the seller has</p> <p>8 remitted, transmitted to Freddie Mac, and housed in</p> <p>9 our corporate data warehouse.</p> <p>10 Q So the information is entered by the</p> <p>11 seller, and Freddie Mac generates this report?</p> <p>12 A So the information is created by the</p> <p>13 seller, transmitted to Freddie Mac through</p> <p>14 The Selling System. That data is housed in our</p> <p>15 corporate data warehouse once we purchase the loans,</p> <p>16 and that data generates this report.</p> <p>17 Q Okay. So somebody at Freddie Mac creates</p> <p>18 this report?</p> <p>19 A Correct.</p> <p>20 Q Does Freddie Mac do anything to</p> <p>21 independently verify the information that's provided</p> <p>22 to you by a seller?</p> <p>23 A Yes.</p> <p>24 Q What do you do?</p> <p>25 A So when we purchase a loan, the original</p>	<p>24</p> <p>1 MR. MADDOCK: Objection, form.</p> <p>2 A So yes, the document custodian, which this</p> <p>3 case was a entity within Washington Mutual Bank, was</p> <p>4 under contract to Freddie Mac to provide those</p> <p>5 services.</p> <p>6 Q So when I ask my question of whether or not</p> <p>7 Freddie Mac independently verifies the information,</p> <p>8 that answer is actually (inaudible) --</p> <p>9 (The court reporter requested clarification</p> <p>10 regarding the question.)</p> <p>11 Q -- incorrect, because Freddie Mac does not</p> <p>12 independently verify this information? It has the</p> <p>13 seller verify the seller's information before</p> <p>14 Freddie Mac purchases the loan?</p> <p>15 A So that's not correct. So we contract with</p> <p>16 a third party. In this case, an entity within</p> <p>17 Washington Mutual. It's a separate company from the</p> <p>18 seller -- to -- and we contract with them to do that</p> <p>19 verification for us. And they're under contract to</p> <p>20 do that.</p> <p>21 Q And in simpler form (phonetic), Washington</p> <p>22 Mutual verified the information that Washington</p> <p>23 Mutual provided you, and then you acted upon that</p> <p>24 certification to purchase that loan without</p> <p>25 Freddie Mac doing anything on its own to verify that</p>

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7 (25 to 28)

<p style="text-align: right;">25</p> <p>1 information?</p> <p>2 MR. MADDOCK: Objection, form.</p> <p>3 A So, again, we rely on the custodian that we</p> <p>4 hire, whether it's Washington Mutual or another</p> <p>5 party, to verify that information, and they're under</p> <p>6 contract to do that for us, and we rely on that</p> <p>7 information.</p> <p>8 Q So Washington Mutual verified Washington</p> <p>9 Mutual's information, and you relied on it?</p> <p>10 MR. MADDOCK: Objection, form, and asked and</p> <p>11 answered.</p> <p>12 MR. MARTINEZ: He hasn't really answered my</p> <p>13 question. It's a yes or no.</p> <p>14 Q So did you hire Washington Mutual to verify</p> <p>15 the information Washington Mutual was providing you,</p> <p>16 and then you relied on that information?</p> <p>17 MR. MADDOCK: Objection, form.</p> <p>18 A Yes.</p> <p>19 Q Okay. Now, I want to look at -- sorry. I</p> <p>20 want to look at Bates stamp 116. If we can go to</p> <p>21 that one. Now, these look to be two separate</p> <p>22 screenshots. They don't look like page 1 of 2 and 2</p> <p>23 of 2. They both appear to be -- well, I guess we'll</p> <p>24 go in order. That top screenshot, can you tell me</p> <p>25 what that is?</p>	<p style="text-align: right;">27</p> <p>1 number here is 145046, which is what was previously</p> <p>2 used to identify Washington Mutual, and now</p> <p>3 identifies JPMorgan Chase as of December 12, 2017?</p> <p>4 A Yeah, at the time of this screenshot that</p> <p>5 is what the information reflected, yes.</p> <p>6 Q Okay. Is there a way to access -- well,</p> <p>7 let me ask this question differently. Does this</p> <p>8 screenshot just identify who a servicer for</p> <p>9 Freddie Mac is, but it's not tied to a particular</p> <p>10 loan?</p> <p>11 A Correct. So this -- every loan in MIDAS</p> <p>12 that has a seller number of 145046 -- this is how we</p> <p>13 would reference to see who is the entity that is</p> <p>14 associated with that ID.</p> <p>15 Q Okay. So this is, effectively, a catalog</p> <p>16 of -- these are the servicers for Freddie Mac and</p> <p>17 here are their unique identifiers?</p> <p>18 A That sounds accurate, yes.</p> <p>19 Q Okay. And on the screenshot at the top on</p> <p>20 116 it says status, colon, suspended. Can you tell</p> <p>21 me why that's there?</p> <p>22 A So if status is suspended, that shows that</p> <p>23 the seller number, so the 145046, is suspended,</p> <p>24 meaning we are not allowing that ID to be used to</p> <p>25 sell loans to Freddie Mac at the time -- at least at</p>
<p style="text-align: right;">26</p> <p>1 A So they are separate screens within MIDAS.</p> <p>2 The first screen -- the top screen says -- it's</p> <p>3 called S, slash, S, so seller, slash, servicer</p> <p>4 profile inquiry.</p> <p>5 Q Okay. And what does this screenshot tell</p> <p>6 me?</p> <p>7 A So this identifies with a particular</p> <p>8 seller/servicer number. In this case, the 145046</p> <p>9 identifies who that is currently in our system.</p> <p>10 Q Okay. And is there a way to tell when this</p> <p>11 screenshot was, I guess -- when the screenshot was</p> <p>12 taken?</p> <p>13 A So, yes, on the top right-hand corner it</p> <p>14 has a date of 12/12/2017, is the date this</p> <p>15 screenshot was generated.</p> <p>16 Q Okay. And like we talked about before,</p> <p>17 when the information is changed in the corporate</p> <p>18 data warehouse, that information reflects in the</p> <p>19 screenshots, obviously, after those changes were</p> <p>20 made, right?</p> <p>21 A Yeah, so once the data in the corporate</p> <p>22 data warehouse is changed for any field on any loan,</p> <p>23 if that field is a loan that's captured in MIDAS,</p> <p>24 the new information would be reflected in MIDAS.</p> <p>25 Q Okay. And that's why the seller/servicer</p>	<p style="text-align: right;">28</p> <p>1 the time we were looking at this.</p> <p>2 Q Is there any way to tell when this --</p> <p>3 again, here, I'll use this as a comparison. In the</p> <p>4 second screenshot on the bottom it looks to be</p> <p>5 similar, but it says status: active.</p> <p>6 A Right. So that is a separate screenshot of</p> <p>7 a seller/servicer profile using the identification</p> <p>8 number. I believe it's 877963. So that identifies</p> <p>9 who the -- in this case, the seller or servicer that</p> <p>10 is associated with that number. And in that case,</p> <p>11 that number is -- status is active.</p> <p>12 Q Okay. Now, when comparing the statuses, is</p> <p>13 there any way to tell -- well, here is another</p> <p>14 question. Are there any other statuses that can be</p> <p>15 reported on these screenshots other than active or</p> <p>16 suspended?</p> <p>17 A I believe those are the two options.</p> <p>18 Q Okay. So then I would assume if it's not</p> <p>19 suspended, it is active then, since those are the</p> <p>20 only two options?</p> <p>21 A That's my understanding, yes.</p> <p>22 Q Okay. So, now, on the first screenshot is</p> <p>23 there any way to tell at what point that status was</p> <p>24 reflected -- well, changed from active to suspended?</p> <p>25 A Not on this particular screen, no.</p>

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8 (29 to 32)

29	<p>1 Q How would I find that out?</p> <p>2 A Again, similar to when the timing of the</p> <p>3 name associated with that ID changed from</p> <p>4 Washington Mutual to JPMorgan Chase, I would look</p> <p>5 for that same information in the same place that</p> <p>6 would identify when that identification number was</p> <p>7 suspended. But it would not be housed in this</p> <p>8 screen on MIDAS.</p> <p>9 Q Is there a particular screen or a separate</p> <p>10 area or report within MIDAS or generated by</p> <p>11 Freddie Mac that would tell me that information?</p> <p>12 A So there would be a way to identify when</p> <p>13 that change occurred. I currently do not recall</p> <p>14 today where that would be, but I could get it.</p> <p>15 Q Okay. And then what I'm going to do is</p> <p>16 leave a spot in the transcript for you to fill in</p> <p>17 later once you find that information. And then once</p> <p>18 you get a chance to review, I'd like you to fill</p> <p>19 that information in for me. Can you do that?</p> <p>20 Because that's something that I would like to know.</p> <p>21 MR. MADDOCK: We'll see about that, but go</p> <p>22 ahead and leave your blank in the transcript.</p> <p>23 MR. MARTINEZ: Very well.</p> <p>24 (The following lines were intentionally left blank.)</p> <p>25</p>	31
30	<p>1 JPMorgan Chase has multiple</p> <p>2 identification numbers that they use to be</p> <p>3 identified as a servicer of loans for Freddie Mac,</p> <p>4 so there would be separate screens for other</p> <p>5 identification numbers that JPMorgan Chase has. In</p> <p>6 this case, there's ten more pages of those.</p> <p>7 Q So, essentially, if I understand your</p> <p>8 testimony, JPMorgan Chase would have 11 different</p> <p>9 six-digit identifiers for (inaudible) --</p> <p>10 (The court reporter requested clarification</p> <p>11 regarding the question.)</p> <p>12 Q -- acting as a servicer on behalf of</p> <p>13 Freddie Mac?</p> <p>14 MR. MADDOCK: I'm going to object on whether</p> <p>15 that accurately reflects his prior testimony.</p> <p>16 Go ahead.</p> <p>17 A So there would be 11 more pages. I would</p> <p>18 not be able to know, standing here, whether that</p> <p>19 would have one identification number per page to</p> <p>20 know if there was exactly 11.</p> <p>21 Q Okay, but -- I understand that, but you are</p> <p>22 saying that JPMorgan Chase has got multiple</p> <p>23 six-digit identifiers in the MIDAS system, correct?</p> <p>24 A Yes.</p> <p>25 Q Why would it have multiple identifiers for</p>	32
30	<p>1 JPMorgan Chase in the MIDAS system?</p> <p>2 A So it's at the seller or servicer's</p> <p>3 discretion. They -- typically, they like to</p> <p>4 identify pools of loans that they service or are</p> <p>5 under contract that they have sold us to track them</p> <p>6 separately, and those identifiers help them to be</p> <p>7 able to track them within our systems and the</p> <p>8 reports that we provide them.</p> <p>9 Q Okay. So you leave that up to the</p> <p>10 servicer? What, do they file separate applications</p> <p>11 for additional numbers? How do they go about</p> <p>12 obtaining another six-digit identifier other than</p> <p>13 one they were originally given?</p> <p>14 A So you're correct. They would submit a</p> <p>15 request to be provided an additional identification</p> <p>16 number that they would like to use to track either</p> <p>17 the selling or servicing of a particular set of</p> <p>18 loans.</p> <p>19 Q Okay. And in this circumstance, these</p> <p>20 additional ten pages that would be behind the</p> <p>21 screenshot or within the system would likely</p> <p>22 identify whatever other servicer numbers they</p> <p>23 decided to apply for?</p> <p>24 A Yes.</p> <p>25 Q Now, I want to go back up to the top</p>	32

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9 (33 to 36)

33	<p>1 screenshot where it says suspended. Does that</p> <p>2 status, suspended, mean that JPMorgan Chase is not</p> <p>3 allowed to service loans under that servicing number</p> <p>4 for Freddie Mac?</p> <p>5 A Well, it reflects that they're not</p> <p>6 allowed -- so, correct, so there are no loans that</p> <p>7 JPMorgan Chase is allowed to sell or service for</p> <p>8 Freddie Mac under that identification number.</p> <p>9 Q Okay. Then, again, I go back to when was</p> <p>10 this identification number that JPMorgan is now --</p> <p>11 was functioning under, when was it suspended?</p> <p>12 MR. MADDOCK: Objection, asked and answered.</p> <p>13 A So I believe I answered that. It would not</p> <p>14 reflect in this screen. We would have records that</p> <p>15 would reflect the timing of that. I just don't know</p> <p>16 where that would be housed sitting here, but I could</p> <p>17 get it.</p> <p>18 Q Okay. Now, when it says that the status</p> <p>19 here is suspended, does that stop -- and because you</p> <p>20 mentioned that JPMorgan has multiple servicing</p> <p>21 numbers that it functions under -- does that stop</p> <p>22 JPMorgan from servicing for Freddie Mac in its</p> <p>23 entirety as an entity or just under this servicing</p> <p>24 number, 145046?</p> <p>25 A Just under that specific ID.</p>	35
34	<p>1 Q Okay. What circumstances would force -- I</p> <p>2 guess would end up getting the status of a</p> <p>3 particular servicing number suspended?</p> <p>4 A Well, in some cases it could be at the</p> <p>5 seller's request to say we are no longer going to</p> <p>6 use that identification number to sell you loans, so</p> <p>7 please -- you know, they wouldn't call it suspended,</p> <p>8 but please know we're not going to deliver loans to</p> <p>9 you anymore; we don't wish to deliver loans or</p> <p>10 service loans for you. That would cause us to put</p> <p>11 it in that suspended category to ensure they don't.</p> <p>12 It could be that they have requested to stop using</p> <p>13 it. It's usually the seller or the servicer says I</p> <p>14 want to stop using that ID. Or, in this case, it</p> <p>15 could be that Washington Mutual, when they went</p> <p>16 under receivership of the FDIC, that we suspended</p> <p>17 the ability for anyone with that -- using that ID to</p> <p>18 sell or service loans for us.</p> <p>19 Q Okay. So you're saying that in this</p> <p>20 circumstance, when WAMU was taken receivership by</p> <p>21 the FDIC, and JPMorgan Chase acquired this loan from</p> <p>22 the FDIC, and that relationship (phonetic), that</p> <p>23 that would have been the time where this status</p> <p>24 would have changed from active to suspended for this</p> <p>25 servicing number?</p>	36

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10 (37 to 40)

<p style="text-align: right;">37</p> <p>1 A Yes, I do.</p> <p>2 Q Can you tell me what this document is?</p> <p>3 A So this is a report. So it's called a TOS</p> <p>4 summary report, so TOS stands for transfer of</p> <p>5 servicing. It comes from our loan status manager</p> <p>6 reporting system. So this is a report that</p> <p>7 identifies for a particular loan; this case, the</p> <p>8 loan ending in 2094, which I believe is the loan we</p> <p>9 are discussing today; shows any transfer of the</p> <p>10 servicing from one identification number to another.</p> <p>11 Q Okay, so this would be the scenario you</p> <p>12 were referring to before, where that 145046 number</p> <p>13 that was suspended, that would be a transfer from</p> <p>14 that number to the new number that JPMorgan Chase</p> <p>15 would be identified under?</p> <p>16 A Correct.</p> <p>17 Q Okay. And where can I see that on this</p> <p>18 document? Can you walk me through that?</p> <p>19 A So it will show you, if you go from left to</p> <p>20 right, it has request date. So that's the date that</p> <p>21 JPMorgan Chase notified Freddie Mac that they would</p> <p>22 like to move the servicing of this particular loan</p> <p>23 from the ID number, 145046, to the new number,</p> <p>24 877903. That's the date they requested it. And the</p> <p>25 date effective is the date that the servicing moved</p>	<p style="text-align: right;">39</p> <p>1 actually suspended?</p> <p>2 A Correct. I can tell you, from looking at</p> <p>3 this TOS report, that up until 10/16/2014, at a</p> <p>4 minimum up to that point in time, that ID was</p> <p>5 active.</p> <p>6 Q How do you know that?</p> <p>7 A Because no one would be allowed to have</p> <p>8 loans underneath that identification number if it</p> <p>9 was in a suspended status. They would -- it</p> <p>10 would be -- no loans would be under that</p> <p>11 identification number if it was suspended.</p> <p>12 Q And there's never been a circumstance where</p> <p>13 a servicer under a suspended servicing number was</p> <p>14 doing something they weren't supposed to be doing,</p> <p>15 ever?</p> <p>16 MR. MADDOCK: Objection, form.</p> <p>17 A So, no, what I'm stating is loans cannot be</p> <p>18 serviced or sold to Freddie Mac under a particular</p> <p>19 identification number if it's in a suspended status.</p> <p>20 So if a number was suspended, the date it was</p> <p>21 suspended, there would not be allowed to be any</p> <p>22 loans serviced or sold to us under that</p> <p>23 identification number.</p> <p>24 Q Well, I understand your policy. What I'm</p> <p>25 asking is what actually occurred. There's really --</p>
<p style="text-align: right;">38</p> <p>1 from that original identification number to the new</p> <p>2 identification number. So that would be</p> <p>3 October 16, 2014.</p> <p>4 Q Okay. And you had indicated previously</p> <p>5 that the 145046 number was suspended and that no</p> <p>6 servicing would be able to be conducted under</p> <p>7 that -- under loans that were tagged to that number,</p> <p>8 correct?</p> <p>9 (The court reporter requested clarification</p> <p>10 regarding the question.)</p> <p>11 A So what I said is as of the date that this</p> <p>12 screen was generated, which I believe was</p> <p>13 December 12, 2017, reflected suspended. So as of</p> <p>14 that date, I can tell you no servicer was allowed to</p> <p>15 service loans under that identification number.</p> <p>16 Looking at the loan status manager, I will make a</p> <p>17 statement that up until at least 10/16/2014, the</p> <p>18 servicer ID number 145046 was in an active status</p> <p>19 because JPMorgan Chase couldn't have been servicing</p> <p>20 under that identification number if it was</p> <p>21 suspended.</p> <p>22 Q But you don't know -- again, you testified</p> <p>23 to previously, you can't tell by looking at any of</p> <p>24 the documents we have in front of us today when the</p> <p>25 loan number -- the servicing number 145046 was</p>	<p style="text-align: right;">40</p> <p>1 there's no way for you to tell whether or not</p> <p>2 JPMorgan Chase was servicing this loan under a</p> <p>3 suspended servicing number at any point because</p> <p>4 these documents don't tell you that information?</p> <p>5 MR. MADDOCK: Objection, form.</p> <p>6 A So as I stated before, the documents in</p> <p>7 front of us do not show exactly when that</p> <p>8 identification number was placed in suspended</p> <p>9 status, but I could get it.</p> <p>10 Q Okay. Okay, so this -- if I'm looking at</p> <p>11 this loan status manager report correctly, it looks</p> <p>12 to me that under the servicer from column, that is</p> <p>13 the servicer and servicing number that servicing is</p> <p>14 being transferred away from, correct?</p> <p>15 A Correct.</p> <p>16 Q Okay. And in that box it identifies</p> <p>17 JPMorgan Chase Bank, NA, and then it says formerly</p> <p>18 known as WAMU. Is there any way -- well, if this --</p> <p>19 let me ask this question differently. Now, the fact</p> <p>20 that JPMorgan Chase Bank, NA is being identified as</p> <p>21 formerly known as WAMU, is that due to the transfer</p> <p>22 or purchase of the assets from the FDIC, the WAMU</p> <p>23 assets from the FDIC?</p> <p>24 A I can't make an assumption, but that sounds</p> <p>25 logical, but I don't know exact reason why the</p>

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11 (41 to 44)

41	<p>1 naming convention is that way. I can tell you the</p> <p>2 seller or servicer, in this case, JPMorgan Chase,</p> <p>3 chose to identify that ID with that naming</p> <p>4 convention.</p> <p>5 Q Okay. Well, because I have a question</p> <p>6 about is this -- does this just reflect the fact</p> <p>7 that there was something changed in the system,</p> <p>8 meaning that instead of 145046 identifying</p> <p>9 JPMorgan Chase only, that, you know, somebody at</p> <p>10 Freddie Mac one day, or at the request of the</p> <p>11 servicer, requested that the identification under</p> <p>12 145046 be changed to JPMorgan Chase Bank, NA,</p> <p>13 formerly known as WAMU?</p> <p>14 MR. MADDOCK: Objection, form.</p> <p>15 A No. I'm stating that the entity, in this</p> <p>16 case, JPMorgan Chase, used that naming convention</p> <p>17 for that particular identification number. That's</p> <p>18 all it shows.</p> <p>19 Q Okay. And is there any way -- or can you</p> <p>20 tell me who the servicer for this loan was at the</p> <p>21 time you acquired it?</p> <p>22 A So the time we acquired it was</p> <p>23 Washington Mutual.</p> <p>24 Q Okay. So Washington Mutual was the</p> <p>25 servicer for the loan. And when did you say</p>	43	<p>1 A Well, it would reflect any change in the</p> <p>2 identification number which the loan was serviced</p> <p>3 under. So in this case, when Chase took over the</p> <p>4 servicing of this loan, they continued to use the</p> <p>5 same identification number, so there would be no</p> <p>6 change reflected in this report because it's --</p> <p>7 continued to be serviced under this same</p> <p>8 identification number until October 16th of 2014.</p> <p>9 Q Is there any way to get this TOS summary</p> <p>10 report at a different date and time? So if I were</p> <p>11 to go back in time and say I wanted to know at the</p> <p>12 date of the foreclosure sale, on July 27, 2012, what</p> <p>13 this screenshot reflected?</p> <p>14 MR. MADDOCK: Objection, form.</p> <p>15 A Well, this loan status manager report would</p> <p>16 only -- right, it pulls data from our corporate data</p> <p>17 warehouse, which houses the current information on</p> <p>18 individual loans. So loan status manager would not</p> <p>19 be able to go back in history and say what was the</p> <p>20 status at a certain date. I would have to look at</p> <p>21 other records to reflect when that change occurred.</p> <p>22 Q And what other records would you look to?</p> <p>23 A I'm not sure, but I know that we track when</p> <p>24 an ID number is changed from one entity to another.</p> <p>25 This is not the only time this occurs. And it would</p>
42	<p>1 Freddie Mac acquired it?</p> <p>2 A Freddie Mac acquired the loan, I believe,</p> <p>3 on July 13, 2000 -- well, it would be on the --</p> <p>4 MIDAS screen would reflect that, but it's</p> <p>5 September 13, 2006.</p> <p>6 Q Okay. So WAMU was the servicer from</p> <p>7 July 2006 forward. How do I know when</p> <p>8 JPMorgan Chase took over as the servicer?</p> <p>9 A So these screens would not reflect the</p> <p>10 timing of the change from Washington Mutual to</p> <p>11 Chase because Washington Mutual took over the</p> <p>12 existing number it was serviced under. So,</p> <p>13 remember, MIDAS only reflects the current entity, so</p> <p>14 I -- similar to knowing when the loan was suspended</p> <p>15 or the exact time of that change, it would be</p> <p>16 reflected in other records, but not these that we're</p> <p>17 looking at.</p> <p>18 Q Well, you said -- I think you testified</p> <p>19 previously that this loan status manager, the TOS</p> <p>20 summary report, specifically deals with transfers in</p> <p>21 servicing, correct?</p> <p>22 A Correct.</p> <p>23 Q And that would house all the information</p> <p>24 related to all the transfers of servicing related to</p> <p>25 a particular loan?</p>	44	<p>1 also -- I would be able to determine, through some</p> <p>2 report or a system -- again, I'm not sure which --</p> <p>3 of the timing of the loan being -- that ID being</p> <p>4 suspended, but I don't have it in front of me.</p> <p>5 Q Would you be able to tell through other</p> <p>6 documents, since this document can't go back in</p> <p>7 time -- what documents would you use to tell me who</p> <p>8 the servicer was on July 27, 2012?</p> <p>9 A Well, I would be able to tell you the time</p> <p>10 frame of from when we purchased a loan until that</p> <p>11 identification number had any change to it. So</p> <p>12 let's say from Washington Mutual to Chase, I would</p> <p>13 be able to identify when that occurred. And then I</p> <p>14 could tell you if that identification number was</p> <p>15 ever changed or when the loan was serviced under a</p> <p>16 new identification number, which this report</p> <p>17 reflects.</p> <p>18 Q So when you testified that WAMU was the</p> <p>19 servicer at acquisition July 2006, what information</p> <p>20 are you basing that off of in order to provide that</p> <p>21 testimony?</p> <p>22 A Well, I --</p> <p>23 Q (Inaudible.)</p> <p>24 (The court reporter requested that Counsel</p> <p>25 repeat the question.)</p>

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12 (45 to 48)

<p style="text-align: right;">45</p> <p>1 Q When you testified previously that WAMU was</p> <p>2 the servicer in 2006 when Freddie Mac acquired this</p> <p>3 loan, what information did you look at or review in</p> <p>4 order to testify to that?</p> <p>5 A Well, I know that Wells -- I mean that</p> <p>6 Washington Mutual sold us the loan. If the loan was</p> <p>7 being serviced by any other entity and it</p> <p>8 subsequently transferred to Chase or another entity,</p> <p>9 that would be reflected here. In this case, the</p> <p>10 original seller, which we all know was</p> <p>11 Washington Mutual -- we identified that with that ID</p> <p>12 number of 145046 -- was Wells -- I mean</p> <p>13 Washington Mutual's identification number at the</p> <p>14 time they sold us the loan, and we know that Chase</p> <p>15 took over the assets of Washington Mutual sometime</p> <p>16 in 2008. That's when the change in servicing would</p> <p>17 have occurred.</p> <p>18 Q So you're inferring that from the</p> <p>19 information you just gave me, but there is nothing</p> <p>20 in the MIDAS system that you reviewed before today,</p> <p>21 or any other system, that gave you that conclusion?</p> <p>22 MR. MADDOCK: Objection, form.</p> <p>23 A So there would be nothing in MIDAS that I</p> <p>24 reviewed that would reflect the timing of when</p> <p>25 Washington Mutual -- Washington Mutual was the</p>	<p style="text-align: right;">47</p> <p>1 Q Okay. So at the top it says it's the loan</p> <p>2 status manager. So I assume that's the system that</p> <p>3 this report is generated from?</p> <p>4 A That's correct.</p> <p>5 Q Okay, and what is this five-page document?</p> <p>6 A Well, it's called a mortgage payment</p> <p>7 history report. So this is a report that shows all</p> <p>8 of the monthly reporting that the servicer did on</p> <p>9 this loan since the time we purchased it up until</p> <p>10 the date of this report, which was identified as</p> <p>11 December 12, 2017.</p> <p>12 Q Okay. Now, I want to go back and look at a</p> <p>13 couple of entries that are in the report. If you</p> <p>14 could turn to the second page, there is a -- there's</p> <p>15 two boxes on the right-hand side about</p> <p>16 three-quarters of the way down. One of them says</p> <p>17 third-party foreclosure sale, and then it has a date</p> <p>18 next to that. Do you see that?</p> <p>19 A Yes.</p> <p>20 Q Can you tell me why that information is</p> <p>21 entered into the report?</p> <p>22 A So the report reflects information that the</p> <p>23 servicer reports to us on a monthly basis. So in</p> <p>24 this case, on that date -- so if you look at the</p> <p>25 date on -- if you go from left to right on this</p>
<p style="text-align: right;">46</p> <p>1 identifier for that ID number and when that was</p> <p>2 changed to Chase would not be reflected in the</p> <p>3 documents I looked at within MIDAS, but I know that</p> <p>4 I have access to those documents.</p> <p>5 Q (Inaudible.)</p> <p>6 (The court reporter requested that Counsel</p> <p>7 repeat the question.)</p> <p>8 Q And those are the documents that we're</p> <p>9 leaving a blank in the transcript for if you need to</p> <p>10 come back in after your review to include that</p> <p>11 testimony (inaudible) --</p> <p>12 (The court reporter requested that Counsel</p> <p>13 check the volume and location of his microphone.)</p> <p>14 (Off-the-record discussion.)</p> <p>15 MR. MARTINEZ: Can you read back what I last</p> <p>16 said for me?</p> <p>17 (Pending question read.)</p> <p>18 MR. MARTINEZ: That's fine. I don't</p> <p>19 actually remember what I said right after that, but</p> <p>20 that's sufficient for me.</p> <p>21 MR. MADDOCK: Same comment, same objection</p> <p>22 with regards to leaving the blank.</p> <p>23 Q Okay. So now I want to take a look at the</p> <p>24 documents that are Bates-stamped 1 through 5.</p> <p>25 A Okay, I have them.</p>	<p style="text-align: right;">48</p> <p>1 second column, on December 12, 2012, the servicer</p> <p>2 reported to us that a foreclosure sale occurred and</p> <p>3 it was sold to a third party. That's what that data</p> <p>4 reflects.</p> <p>5 Q Okay. And on that same line -- I'm going</p> <p>6 to use the column identifiers -- there's a column</p> <p>7 there that's right next to the redacted one, to the</p> <p>8 left of it, and that column carries a title of</p> <p>9 proceeds. Do you see that on the first page?</p> <p>10 A Yes.</p> <p>11 Q Okay. And then if we track that all the</p> <p>12 way down to this loan we were just talking about,</p> <p>13 which looks like the date reported was</p> <p>14 December 6, 2012, it indicates that the proceeds</p> <p>15 there were \$196,626.55. Do you see that?</p> <p>16 A Yes.</p> <p>17 Q What does that entry reflect?</p> <p>18 A So that entry reflects the bid price that</p> <p>19 the servicer reported to us that the property sold</p> <p>20 for and the information that they reported to us.</p> <p>21 Q Okay. And so all the information that's</p> <p>22 included in this mortgage payment history report,</p> <p>23 who enters that information?</p> <p>24 A So it's -- the servicer reports it to us.</p> <p>25 That data goes into, again, our corporate data</p>

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13 (49 to 52)

49	<p>1 warehouse where all the loan-level data is created, 2 and when we go into loan status manager to generate 3 this report, it pulls the data that the servicer had 4 reported to us, that's housed in our corporate data 5 warehouse. 6 Q Okay, but the servicer is the entity that 7 inputs this information in the first place? That's 8 who it comes from? 9 A Yeah, they report that data to us, correct. 10 Q Okay. And do you know how they report 11 their -- or input all that information? 12 A So this particular data is reported 13 through -- it's called DWR. That's just an acronym. 14 So that's the way they transmit that data to 15 Freddie Mac on a -- this is where they can report 16 data to us daily. 17 Q Okay. That's the mechanism how it gets 18 there, but -- so do you know what DWR stands for? 19 A It's an acronym, but I don't recall what 20 the acronym stands for. 21 Q Okay. And is that the system that the 22 servicer is entering information into, which then 23 ultimately transfers to Freddie Mac? 24 A Well, they don't enter -- they -- from 25 their servicing system they would feed that data</p>	51	<p>1 going, I think, probably, more than an hour at this 2 point. If there's a natural spot to take a quick 3 break, that would be great, but... 4 MR. MARTINEZ: Yeah, that's fine. We can do 5 that now if you want. We'll just come back to this 6 when we're done. Want to take a quick ten-minute 7 break? Or if you need any more than that, just let 8 me know. 9 MR. MADDOCK: Okay. Ten minutes. 10 MR. MARTINEZ: Perfect. Thank you. 11 (Off the record.) 12 BY MR. MARTINEZ: 13 Q Okay, so before we went off the record and 14 took a break, we were looking at the document that's 15 Bates-stamped 3, so if you could turn to that page 16 for me in case you moved away from it. 17 A I'm there. 18 Q Okay. And on the right-hand side again 19 there's another column with what looks to be like a 20 separate entry that says inactive (sic) loan, and 21 that looks to be on the date of reporting of 22 January 20, 2011. Do you see that? 23 A Yes. 24 Q Okay. What does that entry mean? 25 A So our servicers are required to remit to</p>
50	<p>1 from their system directly to -- through DWR into 2 our corporate data warehouse, where that data would 3 be received. 4 Q Okay, so DWR is, essentially, the medium by 5 which the information in the servicer's system gets 6 transferred to Freddie Mac? 7 A Yeah. It's the portal that they would go 8 to to transmit that data. 9 Q Okay. When the servicer inputs their 10 information, and in this circumstance it's either 11 WAMU or JPMorgan Chase -- when they input their 12 information into their own system, do you know how 13 they do that? 14 A No. 15 Q So you don't know whether or not they are 16 manually entering every month the principal, 17 interests, and all that stuff, or whether or not 18 some of that is automatically generated? 19 MR. MADDOCK: Objection, foundation. 20 A Correct, I don't know how the servicer 21 generates that data. 22 Q Okay. So I want to take another look at 23 page 3 of this document -- or Bates stamp 3. Sorry. 24 MR. MADDOCK: And Mr. Martinez, we have 25 been -- I don't want to cut you off. We've been</p>	52	<p>1 Freddie Mac the interest that's due on the loan 2 every month regardless of whether the borrower is 3 making payments or not. Once the loan becomes a 4 certain age of delinquency, at least 120 days 5 delinquent, the servicer has the ability to stop 6 passing through that interest. And if they choose 7 to do it, though, that is the timing of when they do 8 that. So that inactivate loan means they're 9 inactivating the requirement to pass through 10 interest for Freddie Mac going forwards. That's all 11 that is. 12 Q Okay. So then in order to -- okay, so when 13 they put this entry in, this is something done by 14 the servicer, correct, this inactive loan? 15 A So the servicers report a code to us, so a 16 code that says I wish to inactivate this loan, 17 meaning -- and that means that they want to stop 18 remitting interest to Freddie Mac on this particular 19 loan, and that reflects that information. 20 Q Okay. And then that would have occurred -- 21 and based on this document, that occurred on 22 January 20, 2011? 23 A Correct. 24 Q And is there -- so in order to -- well, 25 here's this question: Is there anywhere else on</p>

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14 (53 to 56)

53	<p>1 these documents -- since this document was printed</p> <p>2 December 12, 2017, we can say that, I guess, this</p> <p>3 information reports all the way up to -- the most</p> <p>4 recent date reported on the first page is</p> <p>5 November 17, 2017. So between January 20, 2011 and</p> <p>6 November 17, 2017, is there anything on this</p> <p>7 document which indicates that the loan was</p> <p>8 reactivated by the servicer, where they would start</p> <p>9 remitting interest payments to Freddie Mac again?</p> <p>10 A So if--</p> <p>11 MR. MADDOCK: Objection, form.</p> <p>12 A So if they had, you would see the row and</p> <p>13 the timing of that, and it would actually say</p> <p>14 reinstatement. And that would trigger -- that would</p> <p>15 identify -- reflect when they requested that they</p> <p>16 want to start remitting principal or interest to</p> <p>17 Freddie Mac going forward. And that would be</p> <p>18 reflected similar to where it says inactivate loan.</p> <p>19 There would be a line that says reinstatement, and</p> <p>20 then you would see them passing through principal</p> <p>21 and at least interest going forwards.</p> <p>22 Q Okay, so then --</p> <p>23 A In this case there is none.</p> <p>24 Q Right, so they never -- so the servicer, in</p> <p>25 this circumstance, never reactivated this loan?</p>	55	<p>1 see subsequent -- I mean prior to that there is one,</p> <p>2 two, three, four -- for five months that they</p> <p>3 remitted interest and no principal. And then before</p> <p>4 that, you can see principal and interest being</p> <p>5 remitted to Freddie Mac all the way back to when the</p> <p>6 loan was purchased by us.</p> <p>7 Q So then if I understand that correctly, and</p> <p>8 correct me if I'm wrong -- so the five months it</p> <p>9 looks like that there was no principal remitted,</p> <p>10 that would be because the borrower stopped paying,</p> <p>11 correct?</p> <p>12 A So doesn't necessarily state that. It just</p> <p>13 states that the servicer remitted interest to us,</p> <p>14 because -- so that our loans are -- well, they're</p> <p>15 scheduled out, meaning they have to send us the</p> <p>16 scheduled interest that's due us and any actual</p> <p>17 principal they receive from the homeowner. So in</p> <p>18 this case, for those five months they did not</p> <p>19 receive any principal from the homeowner, because</p> <p>20 they're required to report it to us and remit it.</p> <p>21 But they did remit interest to us. Whether that</p> <p>22 came from the borrower or not, Freddie Mac does not</p> <p>23 know.</p> <p>24 Q Okay. And what requires the servicer to</p> <p>25 remit the interest to Freddie Mac?</p>
54	<p>1 A Correct.</p> <p>2 Q Or at least all the way up until</p> <p>3 November 17, 2017. We don't know what it is today,</p> <p>4 but...</p> <p>5 A So, yeah, that's the accounting cycle,</p> <p>6 so -- and, again, this is monthly report, so</p> <p>7 this -- report to us monthly, but as of that</p> <p>8 accounting cycle in November of 2017 they had not</p> <p>9 reinstated the loan in our system to start passing</p> <p>10 through payments or interest.</p> <p>11 Q Okay. And where -- which column on this</p> <p>12 document does it show you that the servicer is</p> <p>13 remitting payments of the interest to Freddie Mac?</p> <p>14 A So where you see one, two, three, four,</p> <p>15 five, six, seven, and eight -- the seventh and</p> <p>16 eighth column it says principal due and interest</p> <p>17 due?</p> <p>18 Q Yeah.</p> <p>19 A If you go through -- down on those on each</p> <p>20 individual page, right up to the row that says</p> <p>21 inactivate, that --</p> <p>22 Q Yup.</p> <p>23 A -- you'll see that in that particular</p> <p>24 accounting cycle they remitted \$963.45. That's the</p> <p>25 interest that was due Freddie Mac. And then you can</p>	56	<p>1 A So that's the terms under which they</p> <p>2 service loans for Freddie Mac. And our guide, which</p> <p>3 is our contract, specifically requires them to --</p> <p>4 and, again, all our loans or most of our loans are</p> <p>5 on a scheduled actual remittance, which means you</p> <p>6 have to remit these scheduled interests due us every</p> <p>7 month up until a time the loan pays off or you</p> <p>8 inactivate the loan, and it gives -- sets forth the</p> <p>9 terms under which they can inactivate the loan. So</p> <p>10 they have to follow that.</p> <p>11 Q So you had mentioned the guide. Is there a</p> <p>12 separate document that governs the relationship</p> <p>13 between Freddie Mac and its servicer?</p> <p>14 A Well, the guide, as far as seller/servicer</p> <p>15 guide, is the contract under which sellers and</p> <p>16 servicers can either sell and service loans for us.</p> <p>17 They have to comply with those requirements in that</p> <p>18 document. That's our contract.</p> <p>19 Q Does the servicer and Freddie Mac, or even</p> <p>20 the seller in that circumstance, ever sign the</p> <p>21 guide? I've never seen there be a signature block</p> <p>22 for the guide.</p> <p>23 A No. So when they become an eligible seller</p> <p>24 or an eligible servicer, or both, we get a signature</p> <p>25 from them on a form that says they will comply with</p>

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15 (57 to 60)

<p>57</p> <p>1 the terms of our guide.</p> <p>2 Q And what is that form called that you have</p> <p>3 them sign?</p> <p>4 A I don't recall the name of it, but it is --</p> <p>5 it's either a letter from the head of our sales</p> <p>6 division or it's a form -- one of those two -- but</p> <p>7 they would countersign that, saying yes, we agree to</p> <p>8 comply with those requirements.</p> <p>9 Q So then that letter or form you're</p> <p>10 referring to, they actually sign, that would be the</p> <p>11 agreement between the parties, and then that would</p> <p>12 just, what, incorporate the requirements in the</p> <p>13 guide?</p> <p>14 MR. MADDOCK: Objection, asks for a legal</p> <p>15 conclusion.</p> <p>16 A So those would -- that would be a, again,</p> <p>17 letter or form that says, yes, we -- from</p> <p>18 Freddie Mac saying you are now an approved seller or</p> <p>19 servicer; by countersigning this, you agree to</p> <p>20 comply with the contract, which is our guide.</p> <p>21 Q Okay. Has a copy of that letter or form,</p> <p>22 whatever was countersigned by the servicer, been</p> <p>23 produced in this litigation?</p> <p>24 A No.</p> <p>25 Q Have you ever seen that document?</p>	<p>59</p> <p>1 or someone actually types in a code that gets</p> <p>2 reported to us, I do not know.</p> <p>3 Q Okay.</p> <p>4 MR. MARTINEZ: Now, I don't think I have</p> <p>5 anymore questions, but I just want to -- I mean, I</p> <p>6 don't know if, John, you're going to have any</p> <p>7 questions.</p> <p>8 MR. MADDOCK: When you wrap up, I might just</p> <p>9 take two minutes to consider it.</p> <p>10 MR. MARTINEZ: Okay. Yeah, go ahead and do</p> <p>11 that then. And, obviously, if I have any others,</p> <p>12 I'll follow up with that. And then I wanted to get</p> <p>13 something on the record before we finish up, after</p> <p>14 the deposition is concluded.</p> <p>15 MR. MADDOCK: Okay.</p> <p>16 (Off the record.)</p> <p>17 EXAMINATION BY COUNSEL FOR FREDDIE MAC</p> <p>18 BY MR. MADDOCK:</p> <p>19 Q Mr. Meyer, you testified that Chase</p> <p>20 purchased certain assets from the FDIC in 2008. Do</p> <p>21 you recall testifying to that?</p> <p>22 A Yes.</p> <p>23 Q And what were the assets that Chase</p> <p>24 purchased in 2008?</p> <p>25 MR. MARTINEZ: Object to the form.</p>
<p>58</p> <p>1 A I have not seen the document for this</p> <p>2 particular seller or servicer, but I've seen them</p> <p>3 before.</p> <p>4 Q But like I said, you haven't seen the one</p> <p>5 that would govern the relationship in this -- with</p> <p>6 this particular servicer, on this particular loan?</p> <p>7 A That's correct.</p> <p>8 Q Okay. Now, going back to this document</p> <p>9 real quick, these entries that we referenced where</p> <p>10 it says third-party foreclosure sale and inactivate</p> <p>11 loan, those are, like, manual entries that were put</p> <p>12 in by the servicer, correct?</p> <p>13 MR. MADDOCK: Objection, form.</p> <p>14 A No. So that is data that the servicer</p> <p>15 reported to us. They're codes. And they usually</p> <p>16 come from their system to our system. How they're</p> <p>17 entered into their system, I do not know.</p> <p>18 Q Okay. But these things aren't -- they</p> <p>19 don't automatically -- the system that the servicer</p> <p>20 works on doesn't automatically trigger these things?</p> <p>21 That's something the servicer has to go in and</p> <p>22 report to Freddie Mac, right?</p> <p>23 A Well, the servicer would have to report to</p> <p>24 us those specific codes. How they generate those</p> <p>25 codes, whether it's automated based on other events,</p>	<p>60</p> <p>1 A So I don't know all the assets they</p> <p>2 purchased. I know that this loan and other loans</p> <p>3 that Washington Mutual was servicing for us, they</p> <p>4 purchased the servicing rights of those assets.</p> <p>5 What other assets, I don't know.</p> <p>6 Q Okay. And with regard to the loan that</p> <p>7 we've been discussing today, what rights in the loan</p> <p>8 did Chase purchase from FDIC?</p> <p>9 MR. MARTINEZ: Object to the form.</p> <p>10 A They purchased the servicing rights.</p> <p>11 Q Okay.</p> <p>12 MR. MADDOCK: All right, that's -- no other</p> <p>13 questions.</p> <p>14 MR. MARTINEZ: All righty, I don't have</p> <p>15 anymore questions.</p> <p>16 I just wanted to make sure, you know, John,</p> <p>17 since you had an objection to what I was referring to</p> <p>18 earlier about leaving a blank in the transcript for</p> <p>19 him to go back and review the documents he said he</p> <p>20 could go back and review -- I just wanted to make it</p> <p>21 clear at the end, so that, you know, if there's going</p> <p>22 to be motion practice, we have a solidified spot in</p> <p>23 the transcript to refer to, so I don't have to go</p> <p>24 searching around for it. Essentially, I understand</p> <p>25 you disagree, but my position is that -- and,</p>


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16 (61 to 64)

61	<p>1 specifically, the two facts I was looking for, that I</p> <p>2 left blanks open for, were for why the suspension of</p> <p>3 the servicer number 145046 occurred, and then when</p> <p>4 that suspension occurred. And that was because of</p> <p>5 the fact that based on the documents that Chase</p> <p>6 produced in this litigation, Mr. Meyer could not</p> <p>7 testify to that information, but he had indicated</p> <p>8 that there were other documents he could go to to</p> <p>9 find that information. That's the information I</p> <p>10 want. And because that's put at issue in this case,</p> <p>11 I think that that's a relevant fact that I should --</p> <p>12 I'm entitled to know, because it surrounds the</p> <p>13 servicing rights and impacts the potential servicing</p> <p>14 relationship with Freddie Mac and whomever its</p> <p>15 servicer was at any given time.</p> <p>16 MR. MADDOCK: Well, the transcript will say</p> <p>17 what it says. If you believe you have rights that</p> <p>18 you can pursue, you're certainly free to do that, and</p> <p>19 we would reserve all of our rights in response.</p> <p>20 MR. MARTINEZ: Okay. And I will do the</p> <p>21 same. Obviously, that doesn't -- you know, if</p> <p>22 Mr. Meyer is to go research and fill in the blank in</p> <p>23 his transcript, as I'm requesting, obviously I'm</p> <p>24 reserving my rights to respond to that information,</p> <p>25 if that even has to come back and ask him another --</p>	63	<p>1 ones that you said were cut off to column J. I just</p> <p>2 want to ask him a couple questions because I had</p> <p>3 never seen them before. But what I'll do is I'll</p> <p>4 just continue to attach all the documents. So 1</p> <p>5 through 7 will be attached. And then the other</p> <p>6 Bates stamp is FHLMC59 and 60, FHLMC69, and FHLMC115</p> <p>7 and 116.</p> <p>8 FURTHER EXAMINATION BY COUNSEL FOR THE PLAINTIFF</p> <p>9 BY MR. MARTINEZ:</p> <p>10 Q And then, Mr. Meyer, if I could have you</p> <p>11 turn to what's Bates-stamped 6 and 7 for me real</p> <p>12 quickly. I understand that part of it is cut off.</p> <p>13 MR. MADDOCK: And Mr. Martinez --</p> <p>14 Q Do you have those documents in front of</p> <p>15 you?</p> <p>16 MR. MADDOCK: Mr. Martinez, before you ask</p> <p>17 questions, I would note that securitization is not a</p> <p>18 listed topic, so instead of objecting to every one of</p> <p>19 your questions as being outside the scope, I'll</p> <p>20 object now.</p> <p>21 MR. MARTINEZ: Oh, if that's what these</p> <p>22 documents pertain to -- I could not tell that by</p> <p>23 looking at this. So if you don't mind, if I could</p> <p>24 just ask him some foundational questions of what the</p> <p>25 documents are to confirm that, and then I won't delve</p>
62	<p>1 you know, a short depo just to respond to the</p> <p>2 inputted information as he fills in the blank. I'm</p> <p>3 reserving my right to do that.</p> <p>4 MR. MADDOCK: Okay.</p> <p>5 MR. MARTINEZ: Just so you understand.</p> <p>6 MR. MADDOCK: And we reserve our rights in</p> <p>7 response.</p> <p>8 MR. MARTINEZ: No problem. I just wanted to</p> <p>9 make it clear in the last bit of the record so we</p> <p>10 could just get that on there. But that's all I have,</p> <p>11 so unless there's anything else you have, John, then</p> <p>12 we're good for the day.</p> <p>13 MR. MADDOCK: The only thing I would have is</p> <p>14 that he would like to read and sign, so...</p> <p>15 MR. MARTINEZ: All right.</p> <p>16 (Off-the-record discussion.)</p> <p>17 MR. MARTINEZ: So just going back on the</p> <p>18 record real quick, I just wanted to attach as</p> <p>19 Exhibit 1, I guess, to the deposition the four sets</p> <p>20 of documents that we had gone through this time. And</p> <p>21 I'll go through the Bates stamps quickly. First off,</p> <p>22 the Bates stamp is Chase, underscore, Cooper,</p> <p>23 underscore, FHLMC00001 through 5. Sorry, guys. I</p> <p>24 just realized that I did not ask him about pages 6</p> <p>25 and 7, the ones that followed those first five, the</p>	64	<p>1 into a topic that's outside the scope.</p> <p>2 MR. MADDOCK: All right, well, the objection</p> <p>3 stands. Go ahead.</p> <p>4 MR. MARTINEZ: Sure.</p> <p>5 Q Mr. Meyer, can you tell me what this</p> <p>6 document on Bates stamp 6 is?</p> <p>7 A So the two documents, page 6 and page 7, is</p> <p>8 a screenshot of our business records that reflects</p> <p>9 when a loan was placed into a security, and then</p> <p>10 when it was removed from a security. That's what</p> <p>11 those two pages reflect.</p> <p>12 Q Okay. And this document doesn't have a</p> <p>13 title on it or a date or anything. Who prepares</p> <p>14 these documents?</p> <p>15 A So they come from our business records.</p> <p>16 This is generated at the time of when the loan is</p> <p>17 removed from a security, that this is what our</p> <p>18 system generates to reflect that activity. And then</p> <p>19 this is housed in -- the data from this is housed in</p> <p>20 our corporate data warehouse.</p> <p>21 Q Okay. Then based on this document, when</p> <p>22 can you tell that this loan was removed from the</p> <p>23 security or removed from securitization?</p> <p>24 A So if you look at page 7, in column F, the</p> <p>25 header is DT mortgage removed, so that's date</p>

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Conducted on December 7, 2018

17 (65 to 68)

<p style="text-align: right;">65</p> <p>1 mortgage removed. And row 3, it has a date of</p> <p>2 12/15/2010, so that's the date the loan was removed</p> <p>3 from the security.</p> <p>4 MR. MARTINEZ: Okay. That's all the</p> <p>5 questions I had. So that's all I have, so, yeah, I'm</p> <p>6 done.</p> <p>7 (Off the record at 3:50 p.m.)</p> <p>8 (Meyer Exhibit 1 was marked for</p> <p>9 identification and is attached to the transcript.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">67</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY REPUBLIC</p> <p>2</p> <p>3 I, LISA KIRK, the officer before whom the</p> <p>4 foregoing deposition was taken, do hereby certify</p> <p>5 that the foregoing transcript is a true and correct</p> <p>6 record of the testimony given; that said testimony</p> <p>7 was taken by me stenographically and thereafter</p> <p>8 reduced to typewriting under my direction; that</p> <p>9 reading and signing was requested; and that I am</p> <p>10 neither counsel for, related to, nor employed by any</p> <p>11 of the parties to this case and have no interest,</p> <p>12 financial or otherwise, in its outcome.</p> <p>13 IN WITNESS WHEREOF, I have hereunto set my</p> <p>14 hand and affixed my notarial seal this 4th day of</p> <p>15 January, 2018.</p> <p>16 My commission expires:</p> <p>17 July 31, 2022</p> <p>18</p> <p>19</p> <p>20</p> <p>21 </p> <p>22</p> <p>23 NOTARY PUBLIC IN AND FOR</p> <p>24 THE COMMONWEALTH OF VIRGINIA</p> <p>25 Notary Registration Number - 7057881</p>
<p style="text-align: right;">66</p> <p>1 ACKNOWLEDGEMENT OF DEPONENT</p> <p>2</p> <p>3</p> <p>4 I, DEAN MEYER, do hereby acknowledge that I</p> <p>5 have read and examined the foregoing testimony, and</p> <p>6 the same is a true, correct, and complete</p> <p>7 transcription of the testimony given by me and any</p> <p>8 corrections appear on the attached Errata sheet</p> <p>9 signed by me.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17 _____</p> <p>18 (DATE) (SIGNATURE)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>